

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Plaintiff, the Federal Trade Commission (“FTC”), and Defendant Jennifer Johnson have jointly moved for entry of this Order releasing funds from the asset freeze ordered in the Temporary Restraining Order and preliminary injunctions in this matter. This Court previously ordered release of certain funds specified below at the preliminary injunction hearing on August 29, 2017. Finding good cause for a limited release of funds to temporarily meet Defendant Johnson’s living expenses, the Court orders as follows:

IT IS ORDERED that Wells Fargo Bank, N.A., shall release \$51,101 to Jennifer Johnson from the frozen account ending in -8880.

IT IS FURTHER ORDERED that Defendant Johnson shall use \$36,210 of the released funds to pay the balance owed to Great Service Landscape for landscaping of Defendant Johnson's primary residence.

IT IS FURTHER ORDERED that Defendant Johnson shall use the remainder of the released funds to pay up to four months' mortgage payments (mortgage held by Wells Fargo Bank) for her primary residence, for total mortgage payments of up to \$14,891.

IT IS FURTHER ORDERED that Defendant Johnson shall make all reasonable efforts to sell her residence to a bona fide third-party purchaser for fair market value, including reasonable and ordinary realtor's fees and closing costs, as soon as practicable. Defendant Johnson shall

1 notify the FTC of the identity of the proposed purchaser no later than 5 business days before the
2 sale closes, and shall provide the FTC with the Closing Disclosure no later than 2 business days
3 before the sale closes. Defendant Johnson shall use the proceeds of such sale to pay off the
4 mortgage and home equity line of credit on the residence. Defendant Johnson shall provide
5 closing documents to the FTC. Defendant Johnson shall deposit any proceeds from the sale that
6 remain after payment of liens and reasonable costs, and any released funds not expended for
7 mortgage payments if the home was sold in less than four months, into a separate, newly opened
8 and specifically designated frozen account that shall not include monies from any other sources.
9 Neither Defendant Johnson nor the FTC waives or concedes any legal or equitable rights,
10 remedies, or defenses they may possess with respect to the property, its proceeds, or any other
11 property, including any rights to statutory characterization of the sale proceeds for exemption
12 purposes. Defendant Johnson and the FTC have stipulated that all applicable statutory
13 exemption periods with respect to the proceeds shall be tolled until the conclusion of this
14 litigation as to Defendant Johnson.

15 IT IS FURTHER ORDERED that Defendant Johnson shall make all reasonable efforts to
16 sell her 2015 Mercedes SUV to a bona fide third-party purchaser for fair market value as soon as
17 practicable. Defendant Johnson shall notify the FTC of the identity of the proposed purchaser
18 and terms of the proposed sale no later than 5 business days before the sale closes, and shall
19 provide the FTC with the sale documents as soon as practicable after the sale closes. Defendant
20 Johnson shall use the proceeds of such sale to pay off the lien on the car held by Elevations
21 Credit Union, and any reasonable costs of the sale. Defendant Johnson shall provide
22 documentation of the sale and lien payoff to the FTC. Defendant Johnson shall deposit any
23 proceeds from the sale that remain after payment of the lien and reasonable costs into the frozen
24 account ending in -8880 held at Wells Fargo Bank.

25 IT IS FURTHER ORDERED that Defendant Johnson may sell or otherwise dispose of
26 personal property consisting of baby clothing, equipment, and accessories, which Defendant
27 Johnson represents is worth approximately \$400 to \$500, and may retain proceeds from such sale
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1 up to \$500. Should the items sold net more than \$500, Defendant Johnson shall place the
2 amounts exceeding that cap into the frozen account ending in -8880 held at Wells Fargo Bank.

3 SO STIPULATED:
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5 **FOR THE PLAINTIFF FEDERAL TRADE COMMISSION:**

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10 **FOR DEFENDANT JENNIFER JOHNSON:**
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12 */s/ Richard Newman*
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20 **IT IS SO ORDERED:**
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23 UNITED STATES DISTRICT JUDGE

24 DATED: 9/15/2017
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